

AO 91 (Rev. 11/11) Criminal Complaint

United States District Court
Southern District of Texas
FILED

UNITED STATES DISTRICT COURT

for the

Southern District of Texas

JAN 16 2019

Clerk of Court

United States of America

v.

1. Vanessa LOPEZ (1996/US)

Case No.

M-19-0109-M

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of January 15, 2019 in the county of Refugio in the
Southern District of Texas, the defendant(s) violated:

Code Section

Offense Description

21 USC § 841

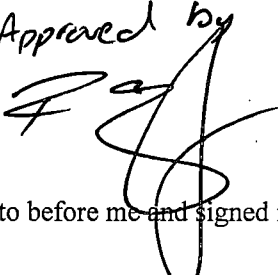
Possession of a Controlled Substance with Intent to Distribute /
Approximately 12 Kilograms of Cocaine, a Schedule II Controlled Substance.

21 USC § 846

Conspiracy to Possess with Intent to Distribute a Controlled Substance /
Approximately 12 Kilograms of Cocaine, a Schedule II Controlled Substance.

This criminal complaint is based on these facts:

See Attachment "A"

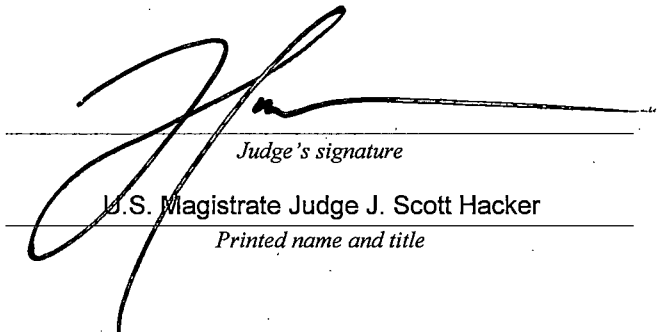
☒ Continued on the attached sheet.Approved by


Complainant's signature

Nicholas C. Stott, HSI Special Agent

Printed name and title

Sworn to before me and signed in my presence.

Date: 01/16/2019City and state: McAllen, Texas

Judge's signature

U.S. Magistrate Judge J. Scott Hacker

Printed name and title

Attachment A

I, Nicholas C. Stott, am a Special Agent of the United States Homeland Security Investigations (HSI) and have knowledge of the following facts. The facts related in this attachment do not reflect the totality of information known to me or other agents/officers, merely the amount needed to establish probable cause. I do not rely upon facts not set forth herein in reaching my conclusion that a complaint should be issued, nor do I request that this Court rely upon any facts not set forth herein in reviewing this attachment in support of the complaint.

1. On January 15, 2019, Homeland Security Investigations in McAllen, Texas, (HSI McAllen) received a request for investigative assistance from the Refugio County Sheriff's Office in Refugio, Texas. Deputies with the Refugio County Sheriff's Office arrested Vanessa LOPEZ (hereinafter LOPEZ), a citizen of the United States, after being found in possession of approximately 12 kilograms (kg) of cocaine concealed within aftermarket constructed concealed compartments in the floor and undercarriage area of the Ford sport utility vehicle she was driving.
2. Refugio County Sheriff's Office deputies stopped LOPEZ for committing a traffic violation on North Victoria Highway in Refugio, Texas. LOPEZ was traveling with a female passenger and a minor.
3. During the course of the traffic stop, Refugio County Sheriff's Office deputies became suspicious that LOPEZ was involved in criminal activity and requested and were given consent to search the vehicle.
4. A physical search of the vehicle was conducted, and 12 tape wrapped packages, weighing approximately 12 kilograms, were discovered concealed within aftermarket constructed concealed compartments in the floor and undercarriage of the vehicle. Refugio County Sheriff's Office deputies field tested the substance inside the packages which were positive for the characteristics of cocaine.
5. Homeland Security Investigations (HSI), Special Agents (SA) responded to the Refugio County Sheriff's Office to assist in the investigation. HSI SAs interviewed LOPEZ who, after providing several inconsistent and false statements, stated she was being paid by an unknown person in Mexico to transport what she suspected to be drugs from Mexico into the United States and to deliver said drugs to another unknown individual. LOPEZ admitted to making several previous trips into the United States for the purpose of smuggling, including while traveling with one of her children.